

September 6, 2005

R-19J

Mr. Philip Smithmeyer
Chicago Airports District Office Manager
Federal Aviation Administration, Chicago Airports District Office
2300 East Devon Avenue
Des Plaines, Illinois 60018

Re: Comments on the O'Hare Airport Modernization Final Environmental Impact Statement (FEIS), Cook and DuPage Counties, Illinois, EIS No. 20050316

Dear Mr. Smithmeyer:

I am providing comments on the O'Hare Airport Modernization Final Environmental Impact Statement (FEIS), consistent with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. The Federal Aviation Administration (FAA) evaluated several O'Hare build alternatives in detail in the FEIS and identified Alternative C, the airfield configuration proposed by the City of Chicago known as the O'Hare Modernization Program, as the preferred alternative.

As we indicated in our comments on the Draft Environmental Impact Statement (DEIS), dated April 6, 2005, the U.S. Environmental Protection Agency (U.S. EPA) has worked with FAA on the environmental impact analysis for O'Hare improvements for over three years. Due to that early coordination, many analytical issues and general concerns about the project were addressed during planning. The DEIS reflected that work, so U.S. EPA focused on providing recommendations for improving the analysis, improving public disclosure, and mitigating potential adverse environmental impacts regarding air quality (criteria pollutants and hazardous air pollutants), wetlands, stormwater, noise, and environmental justice. U.S. EPA recommended specific mitigation measures for wetlands, noise, and air impacts.

FAA and the City of Chicago responded well to our comments on the DEIS. With respect to analysis or informational gaps, FAA provided information in the FEIS that addressed our concerns regarding water quality, noise, environmental justice, and alternatives analysis. Regarding air quality analysis and informational gaps, we acknowledge FAA's work on general conformity, inclusion of airport related emissions for particulate matter 2.5 microns or less (PM_{2.5}), and dispersion analysis of PM_{2.5}. U.S. EPA previously identified a concern regarding the selection of one year of meteorological data as representing worst-case weather conditions, rather than the use of five full years. Information was presented in the FEIS to support the choice of 1990 as the worst-case meteorological year for criteria pollutant dispersion modeling. Based on the information included in the FEIS together with Illinois

Environmental Protection Agency's (IEPA) involvement on this issue, we concur with your use of 1990 as the worst-case meteorological conditions for the five-year period under consideration for this project. However, use of five years of meteorological data remains our accepted practice and we anticipate that FAA would also rely on this standard for use in future FAA projects unless explicitly exempted.

With respect to mitigation, we are pleased that FAA has included most of U.S. EPA's recommendations; however, FAA has not established commitments for such mitigation. As indicated in the FEIS, we expect that firm commitments will be made in the Record of Decision (ROD) for the project. We note that the FAA has quantitatively analyzed components of a diesel emissions reduction program by evaluating sulfur dioxide, particulate matter 10 microns or less (PM10), and volatile organic compound (VOC) reductions associated with low sulfur fuel and particulate traps for construction equipment. We also note that the FEIS reiterates the City's commitment to electrify/modernize gates at O'Hare. U.S. EPA's recommendation to address Ground Support Equipment (GSE) was one measure that was not included on the list of possible mitigation actions in the FEIS. We continue to recognize the potential positive impact of either retrofitting existing diesel GSE or replacing or converting GSE to electric power or alternative fuels. We urge FAA to include GSE mitigation in the ROD. The FEIS includes the provision that three air quality monitors would be purchased and installed at O'Hare. U.S. EPA supports installation of ambient air monitors and looks forward to working with FAA, IEPA, and others to provide any assistance that we can, including determining sampling locations, schedules, and parameters.

On wetland impacts, the FEIS reflects 447.4 acres of wetland mitigation credits, based on ratios U.S. EPA recommended in the DEIS comments. We believe the process for establishing appropriate wetlands compensation under Section 404 of the Clean Water Act, combined with the multi-agency review team approval, will result in the selection and establishment of high quality wetland mitigation sites that will replace the functions and values of those wetlands lost due to implementation of the project. The noise mitigation proposal included in the FEIS responds to our DEIS comments on noise. We are pleased to note the inclusion of multi-family housing in the mitigation plan. More importantly, we commend the FAA and the City of Chicago for the use of two sound contours (build-out year and build-out year plus five years) for targeting noise mitigation and the aggressive timeframe established for achieving the mitigation goals.

As stated above, the FEIS does not specifically commit to the array of mitigation options it contains. Although the list of such options is extensive, there is a lack of firm commitments to implement specific mitigation measures. Without explicit commitments, it is not clear whether the project will include all, some, or none of the mitigation measures listed in the document. For this reason, we retain environmental concerns regarding mitigation for the project.

We are pleased to note that the City has incorporated in the FEIS its Sustainable Design Manual and Green Airport Initiatives Best Management Practices Manual. We look forward to their incorporation into the ROD. We agree that the City, once again, has the opportunity to be an environmental leader by incorporating green airport design, construction, operation,

and maintenance practices at O'Hare. At the time of the DEIS, U.S. EPA recommended that the City of Chicago consider implementation of an Environmental Management System (EMS). The FEIS states that the City has agreed to monitor green airport design, construction, operation, and maintenance activities and that FAA will oversee the City's progress. At this time, we do not know what the FAA or the City's plans will be in this regard. We would like to work with FAA and the City of Chicago to develop a mechanism to track environmental performance at O'Hare. An EMS can provide a mechanism to track long-term mitigation measures associated with this project and document measurable environmental results. Regardless of the approach that is committed to in the Record of Decision (ROD), we recommend that it include commitments to share relevant information, including environmental data, as appropriate, with us, other interested agencies, and the public.

Thank you for the opportunity to comment on the FEIS for this project. We will continue to work closely and collaboratively with FAA and the City of Chicago. We will be interested in seeing your response to our comments in the forthcoming ROD. As always, we are willing to meet and discuss our concerns with you. If you have any questions, please contact me. The staff person assigned to this project is Sherry Kamke; she can be reached at (312) 353-5794 or via email at kamke.sherry@epa.gov.

Very truly yours,

/s/

Bharat Mathur

Deputy Regional Administrator